



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 13, 2017

By Electronic Mail

The Honorable Richard J. Sullivan
United States District Court
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jona Rechnitz, 16 Cr. 389 (RJS)

Dear Judge Sullivan:

The Government respectfully requests that, with the limited exception noted below, the Court unseal the Information, related charging documents, waiver of indictment, plea transcript, the Government's correspondence relating to the sealing of materials, and accompanying docket entries, in the above-referenced case. The Government believes that the factors necessitating continued sealing no longer outweigh the presumption of public access to Court filings. *See Lugosch v. Pyramid Co.*, 435 F.3d 110, 120 & 123 (2d Cir. 2006).

With respect to the plea transcript and correspondence relating to the sealing in this case, the Government respectfully requests that those materials be filed in the redacted form as set forth in the attached Exhibit A. The Government submits that the redacted matters relate to an ongoing investigation for which redaction is appropriate. *See United States v. Cojab*, 996 F.2d 1404, 1408 (2d Cir. 1993). Defense counsel does not object to this request.

Respectfully submitted,

JOON H. KIM
Acting United States Attorney

By: _____/s/
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Attch.

Cc: Alan Levine, Esq.
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